

**COHEN, FRANKEL & RUGGIERO, LLP**

ATTORNEYS AT LAW  
20 VESSEY STREET, SUITE 1200  
NEW YORK, NEW YORK 10007  
(212) 732-0002 • FAX (212) 293-7224

MARK L. COHEN  
PETER M. FRANKEL  
LOUIS J. RUGGIERO  
MINA KENNEDY  
GILLIAN M. FEEHAN\*

\*ADMITTED IN NJ AND PENDING ADMISSION IN NY

35-07 90<sup>TH</sup> STREET  
JACKSON HEIGHTS, NEW YORK 11372  
(718) 898-4900 • FAX (718) 898-0093  
PLEASE DO NOT REPLY TO THIS OFFICE

May 14, 2021

**VIA ECF**

The Honorable Sidney H. Stein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

**Re: *United States v. Mattie Cirilo*  
19 Cr. 833 (SHS)**

Dear Judge Stein:

Please recall that I represent Ms. Mattie Cirilo in her defense of the above-captioned matter. Ms. Cirilo is presently scheduled to appear before Your Honor for a sentencing hearing on June 9, 2021, at 2:30 p.m. I write to respectfully request a six-week adjournment of Ms. Cirilo's sentencing hearing and a corresponding extension of the sentencing submission schedule.

Ms. Cirilo is presently seeking to adopt or obtain legal guardianship of her husband's son from a previous relationship. Adoption/guardianship proceedings are ongoing and will require more time than initially anticipated, as the child's biological mother recently decided to contest the adoption. Appointed experts are conducting evaluations, and once their reports are published, Ms. Cirilo's attorney expects the case to move to mediation. Due to the possibility that both Ms. Cirilo and her husband will be sentenced to staggered terms of incarceration, we respectfully request that Ms. Cirilo's sentencing hearing be adjourned in an effort to settle the adoption/guardianship case prior to sentencing.

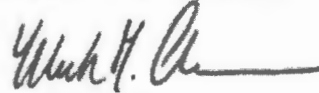
In addition, as Your Honor is aware, Ms. Cirilo's husband, Derek Larkin, was diagnosed with a mass in his lungs and requires a PET scan to determine if the mass has grown and requires a biopsy. The PET scan will not be scheduled until after May 26, 2021 (Mr. Larkin's original sentencing date), and it will likely take additional time for Mr. Larkin to receive his results and, if necessary, schedule a biopsy. It is respectfully requested that Ms. Cirilo be afforded more time to accompany her husband to his medical appointments and obtain some clarity as to his physical health before her sentencing date.

Therefore, I respectfully request a six-week adjournment of Ms. Cirilo's sentencing hearing in order to allow time for the resolution of her adoption/guardianship case and to obtain

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more information about her husband's medical condition. I respectfully request that the due dates for the parties' respective sentencing submissions be adjusted to correspond with Ms. Cirilo's new anticipated sentencing date and in accordance with Your Honor's Rules. Thank you for your consideration.

Respectfully submitted,



Mark I. Cohen

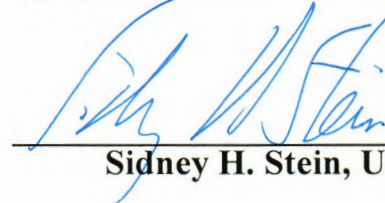
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Cc: A.U.S.A. Kiersten Fletcher (via ECF)  
A.U.S.A. Benet Kearney (via ECF)  
A.U.S.A. Robert Sobelman (via ECF)  
Ms. Mattie Cirilo (via email)

**The sentencing is adjourned to June 22, 2021, at 2:30 p.m. and will occur as a video conference. Defense submissions are due by June 8, government submissions are due by June 15.**

**Dated: New York, New York  
May 14, 2021**

**SO ORDERED:**



**Sidney H. Stein, U.S.D.J.**